

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DEFENSE DISTRIBUTED and SECOND
AMENDMENT FOUNDATION, INC.,

Plaintiffs,

v.

GURBIR GREWAL, et al.,

Defendants.

Case No. 1:18-CV-637-RP

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DECLARATION OF ALAN GOTTLIEB

I, Alan Gottlieb, declare:

1. I am a citizen of the United States and a resident of the State of Washington.

2. I am the Executive Vice President of the Second Amendment Foundation, Inc. ("SAF").

3. SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington.

4. SAF has over 650,000 members and supporters nationwide, including Texas.

5. The purposes of SAF include education, research, publishing and legal action focusing on the constitutional right to privately own and possess firearms, and the consequences of gun control.

6. The issues raised by, and consequences of, Defendants' threats against Defense Distributed, are of great interest to SAF's constituency.

7. Many law-abiding and responsible adult SAF members and supporters would access, study, share, modify, and learn from the digital firearms information published and republished by Defense Distributed, as well as similar information related to firearms that they or others have created, to include computer assisted design ("CAD") files.


8. SAF members would create, share, publish, and republish digital firearms information, to include CAD files.

9. In furtherance of SAF's mission, and to serve its members and the public, SAF would publish, republish, and promote, on the Internet, the free distribution of Defense Distributed's digital firearms files, and allow its members and others to upload their own digital firearms files to SAF's servers for Internet publication. SAF is presently refraining from doing so only owing to the Defendants' threats against Defense Distributed.

10. SAF is proud to bring this action on behalf of its members.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 29th day of November, 2018.



Alan Gottlieb